



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AES:SCJ/PP
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 17, 2019

BY ECF

The Honorable Vera M. Scanlon
United States Magistrate Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG) (S-1)

Dear Judge Scanlon:

Pursuant to the Court's Order of April 11, 2019, the privilege review team writes to provide a status update to the Court regarding outstanding privilege related disputes. On April 11, Judge Garaufis ordered that the parties must seek review of your prior privilege rulings by no later than today. The government intends to file such a motion by the end of today.

With respect to the documents seized from 8 Hale, the privilege review team sent the documents that had been segregated by the privilege review team to Michael Sullivan on or about April 10. On April 16, Mr. Sullivan indicated that he was asserting Nxvim's privilege over approximately 575 of those documents. The privilege review team has not yet had an opportunity to evaluate those documents, but expects to dispute the privilege designation of many of them. The government will segregate those 575 documents for the time being, and provide the remaining 8 Hale documents to the prosecution team.

With respect to the third list of approximately 5,200 documents that the privilege review team had marked as not privileged and sent to defense counsel on March 12, 2019, counsel for Keith Raniere informed us on April 14 that he is not asserting privilege over any of those documents, counsel for Nancy Salzman informed us on April 8 that she is asserting privilege over 5 documents, counsel for Clare Bronfman has not finalized her review but, on April 16, provided a preliminary list of approximately 305 documents that she claims are privileged. In addition, Mr. Sullivan, on behalf of Nxvim, is also asserting privilege over approximately 120 documents that were seized from Nancy Salzman. The privilege review team has not yet had an opportunity to evaluate those documents that

Bronfman and Sullivan have asserted are privileged, but expects to dispute the privilege designation of many of them. Once we are provided with Bronfman's final list, we will provide the documents that are not subject to a privilege assertion to the prosecution team.

Respectfully submitted,

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By: /s/
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cc: Clerk of the Court (by ECF)
Counsel for Defendants (by ECF)